

1 Mr. Mihaly.

Ramco 2 MR. MIHALY: Q Have you had any contacts with  
3 over -- concerning these peakers -- you personally?

4 A Personal contact --

5 Q Yes.

6 A -- with Ramco? Let me think a moment. My  
7 contact with Ramco on these units has been in the area  
of 8 the interconnection study work for these units.

9 Q Could you describe what that involved?

10 A Just as any other applicant who desires to  
11 construct a generating unit and interconnect with the  
SDG&E 12 system is required to do, Ramco filed application to  
13 connect, I believe, a total of three of these peaker  
units 14 with the SDG&E system.

15 And upon our acceptance of those  
applications, 16 those units were placed in our generation  
interconnection 17 queue.

18 We then tendered them a contract ~~review~~ for |  
19 interconnection study, which Ramco executed for each of  
20 these units. I believe they were one study for the  
first 21 two units, and a separate study for the third unit, for  
the 22 Chula Vista 2 unit that you asked me about earlier that  
was 23 the subject of a letter to Commissioner Laurie. And we  
24 conducted those interconnection studies, and published  
those 25 study results, and provided copies to Ramco and to the  
26 California ISO.

27 Q About when was that?

28 A That would have been last year.

1 through the Mexican system in Baja California to the west,  
2 and then some part returning north from Tijuana to Miguel.  
3 Is that what you were asking me about?

4 MR. MIHALY: Q That is correct. I realize that  
5 Path 45, that does not describe that entire system. For  
6 ease of --

7 ALJ COOKE: Wait. Can I just ask a clarification  
8 question?

9 MR. MIHALY: Please.

10 ALJ COOKE: Mr. Korinek, are you saying that from  
11 your -- that Path 45 does not include the Mexican system; it  
12 includes simply the lines from SDG&E's system that go to the  
13 Mexican substations?

14 THE WITNESS: That's right, your Honor.

15 ALJ COOKE: Okay. Thank you.

16 MR. MIHALY: Q So my question is: Do you know the  
17 amount of the unscheduled flow that would follow the route  
18 you just described?

19 A Well, that depends entirely on the operating  
20 conditions at the time of the event.

21 Q In what way does it depend on the operating  
22 conditions?

23 A It depends on the flow levels from as ~~as~~ Arizona  
to southern

24 California. It depends on any generation that is or is not  
25 operating to the east of Imperial Valley in either the  
26 Imperial Valley or Mexicali area. So it depends on a host  
27 of variables, as well as the SDG&E import level at the time,  
28 and the CFE Baja California import level at the time. So

1 there is no single answer.

2 Q Is there a range?

3 A Yes.

4 Q What is it?

5 A A typical range for that number could be from  
6 zero to hundreds of megawatts.

7 Q Hundreds?

8 A Mm-hm.

9 Q As in 100, 200, 300, or 1,100?

10 A I would not expect to see an unscheduled flow  
11 anywhere near 1,100 megawatts. And any unscheduled flow of  
12 that level would immediately cause an ~~eruption~~ interruption  
of the path

13 ~~using~~ -- based on the operation of existing protective  
14 devices through that unscheduled flow path, so that the flow  
15 level you mentioned would only be there for a moment, and  
16 then it would be zero.

17 ALJ COOKE: Mr. Korinek, on this diagram --

18 THE WITNESS: Yes.

19 ALJ COOKE: -- there are quite a few proposed 230-kV  
20 transmission lines shown on it. Would those transmission  
21 lines be -- as they head to the Mexican substations from the  
22 SDG&E system, would they be considered part of Path 45?

23 THE WITNESS: There are two lines that are drawn on  
24 this diagram that are dashed as future proposals that would  
25 become part of Path 45. That would be the dashed green line  
26 between La Rosita and Imperial Valley, and the dashed line  
27 between Tijuana to the proposed Otay switchyard to Miguel.  
28 Those would become part of Path 45.

1     you'd like to turn there.

2             Q     Sure. This is Exhibit 207. And I believe we're  
3     talking about some discussion that occurs on page 9 of  
4     Exhibit 207 in the, I guess, first numbered paragraph.

5             A     Actually, it's San Diego Gas & Electric's  
6     Exhibit 6, Reference Appendix E, which was filed on  
7     April 12th of 2002.

8             ALJ COOKE: Let's be off the record.

9                     (Off the record)

10            ALJ COOKE: Let's be back on the record.

11                    While we were off the record, we verified that  
12     this exhibit has been marked twice: as Exhibit 6, and as  
13     Exhibit 207. It is the SDG&E and California review group's  
14     accepted rating report of the south of SONGS Path 3 Re-rating. |  
15     Let's just, for ease of reference, use Exhibit 6.

16                    And what was your question, Mr. Scarff?

17            MR. SCARFF: We were talking about the Edison  
18     Del Amo-Ellis line, and its role in the Path 44 rating. And  
19     that, I believe, is discussed on page 9 of Exhibit 6.     ]

20                    And let me -- after Mr. Korinek has had a chance  
21     to look at that.

22                    My understanding is that the study group wanted  
23     to keep the South-of-SONGS rating at 2500 megawatts out of  
24     concern of what would happen to the system after the loss of  
25     SWPL, after the loss of Encina, if the Del Amo-Ellis line  
26     were to have an unscheduled outage; is that your  
27     understanding of the discussion here?

28            A     Well, page 9 that you have referred to, at

1 paragraph 3, No. 1, specifically states that under  
2 2500 megawatts South-of-SONGS flow and SWPL open conditions,  
3 the loss of the SCE Del Amo-Ellis line loads ~~to~~ the Barre- |  
Ellis  
4 230 kV line to 99.8 percent of its N minus 1 contingency,  
5 quote, A, unquote, rating of 2,850 amps, period.

6 I believe that answers the question.

7 I might point out that while you were looking for  
8 the cite, I checked Edison's system map. And it appears  
9 that the Del Amo terminal is actually in Los Angeles County,  
10 and the Ellis terminal is in Orange County if I understand  
11 their map correctly.

12 Q So if we read this report here, the paragraph you  
13 just quoted from, it says that that loading is acceptable  
14 under the circumstances, but that that -- would it be fair  
15 to say that the -- let me restart.

16 You've had two contingencies already. You've  
17 had -- well, let me -- when we talk about Encina 5 as being  
18 the first event, G-1 event, we're talking about an  
19 unscheduled outage at Encina?

20 A No, that can be either a scheduled or  
21 unscheduled. There's nothing in the criteria that says that  
22 that has to be a forced or unplanned outage. In my  
23 interpretation it could be a planned outage as well.

24 Q The SWPL outage we're referring to is likely --  
25 well, can that be -- is that just a forced outage?

26 A That would refer to a forced outage, yes.

27 Q So you've gotten Encina down. You've got this  
28 forced outage at SWPL, and now your concern is to protect

1 Project in 2005.

2 The ORA's testimony did not suggest  
combinations

3 of its alternatives, that I recall, involving partly  
~~blocked-block~~

4 transfers and partly other upgrades.

5 So we assumed that, by and large, it was  
your

6 intent that such alternatives would have a stand-alone  
7 benefit. And we assumed in this case that if we were  
going

8 to use this blocked transfer concept -- and it may be  
worth

9 my explaining it further in terms of what it's intended  
to

10 do -- but if that was the approach that one intended to  
11 take, that that would be the course that you would stay  
12 until Valley-Rainbow were needed. That was the basis  
for my

13 analysis.

14 Q Have you or your staff discussed this  
alternative

15 with Edison?

16 A Not to my knowledge, no.

17 Q If you were to do some block transfer, would  
the

18 first 50 or 100 or 200 megawatts of this transfer be  
the

19 least costly to implement of all the potential block  
20 transfer to Orange County -- in Orange County?

21 A No; it could actually be the most expensive  
to

22 implement.

23 Q And why would that be?

24 A That's simply because there are currently no  
25 interconnections of any kind between San Diego Gas &  
26 Electric's ~~130A~~ 139 kV facilities in Orange County and  
Southern

27 California Edison's 69 kV facilities in Orange County.

28 That means that transformation substations  
would

north

1 have to be built on new sites with new right-of-way between  
2 our ~~130A~~ 138 kV system and the Edison 69 kV system to the  
3 in order to accomplish 1 megawatt of load transfer. Costs  
4 for that first megawatt could be astronomical.

5 MR. SCARFF: We're winding down our questions here  
6 slowly, your Honor.

7 Q One of the options that was put forward by ORA  
8 was the use of series reactors on the SONGS corridor to  
9 optimize the use of the existing 230 kV transmission lines.

10 And I believe you indicated cost of 25 to  
11 30 million dollars. And this would be on page 2-1 of  
12 Attachment 7 -- 20 to 50 million dollars -- excuse me -- for  
13 the cost.

14 Has San Diego Gas & Electric studied this option?

15 A We have studied the use of series reactors on  
16 230 kV systems, yes.

17 We have not studied the use of them on the South-  
18 of-SONGS system or North-of-SONGS system to my recollection.

19 Q And is there any reason why you haven't?

20 A We don't feel there is any benefit to doing so.

21 Q What is the basis for your cost estimate of 25 to  
22 30 million dollars?

23 A We surveyed various databases that were available  
24 on the cost of series reactors, including databases  
25 published on web sites by the Department of Energy and also  
26 by the Pacific -- I'm sorry -- the  
27 Pennsylvania/Jersey/Maryland PJM Power Pool and other  
28 parties and found that those costs came out to this range

1 ALJ COOKE: So there could be a momentary or very  
2 short-term serving of the load with the additional loss of  
3 Valley-Rainbow in this hypothetical but not a longer  
4 duration?

5 THE WITNESS: Yes.

6 For example, a lot of these ratings may have  
7 a one-hour limit on them. So the operators during that one  
8 hour would take the additional actions necessary to either  
9 reduce the South-of-SONGS path loading -- path schedule,  
10 I should say, down to 2,500 megawatts; or, if they were able  
11 to restore the Southwest Power Link within that one hour,  
12 then they would be able to avert any further load shedding.

13 ALJ COOKE: Thank you.

14 MR. SCARFF: Q When you say further -- when you're  
15 talking about reducing the -- if you had to reduce  
16 the imports down to this 2500-megawatt limit, this would  
17 mean you would have to -- and the only way you can do that  
18 would be to shed load.

19 You'd have to shed somewhere between 700 and  
20 900 megawatts of load depending upon what the rating of the  
21 path was, ~~at~~ 3200 or 3400 megawatts, before Valley-Rainbow  
22 went down?

23 A You're suggesting the case where the Southwest  
24 Power Link cannot be restored to service within the one-hour  
25 emergency rating example --

26 Q Yes.

27 A -- that I explained to Judge Cooke?

28 And you're saying what would then take place?



1 How would the ISO operator deal with that?

2 You've got -- I think we had said that  
3 the general -- the first action was dispatching that  
4 remaining generation which brought the import level down  
5 to 3,420 megawatts.

6 Then I'd said, assuming that the firm path rating  
7 declared by ISO was 3200 megawatts, that we would have  
8 to drop ~~320~~ 220 megawatts of Orange County and San Diego  
County.  
9 customer load.

10 So you're saying the hour has now -- is now about  
11 to expire; and in spite of SDG&E's and the ISO's best  
12 efforts, the Southwest Power Link is still out of service.

13 The ISO operator at that point would be required  
14 to take further action for he is in violation of emergency  
15 ratings. He is in violation of WSCC operating criteria, and  
16 he is at risk of sanctions.

17 He's also at risk of burning the system down.

18 At that point in time, he would have to order  
19 additional load shedding, would be my assumption, unless  
20 he had come up with some other solution that wasn't  
21 previously available; and I have no idea what that would be.

22 The only thing I can think of, practically  
23 speaking, would be to order further load shedding in the  
24 San Diego and possibly even in the Edison service area.  
25 I don't know what overloads he might be trying to counteract  
26 at that time.

27 Q You described a situation of what would happen  
28 if Valley-Rainbow went down and how that could lead to load

1 rating.

2 Q And this is because the greater the assumed  
3 minimum wind speed, the greater convection of heat away from  
4 the conductor?

5 A Yes, that's true.

6 Q Okay. Is it correct that SDG&E rates on a  
7 thermal basis its transmission lines, using an assumed wind  
8 speed of 2 feet per second?

9 A Yes. As I recall, that's correct.

10 Q And would SDG&E's thermal ratings of all your  
11 lines increase if SDG&E assumed wind speeds that were higher  
12 than 2 feet per second?

13 A If you made an arbitrary rating assumption to go  
14 to a higher wind speed than the overhead-conductor portion,  
15 the lines would be at a higher rating. The terminal  
16 equipment and underground portions of lines would not be  
17 affected by an assumption of higher wind speed.

18 Q Consistent with your last answer. So if SDG&E  
19 increased the assumed wind speed to, say, 4 feet per second,  
20 the thermal ratings of the conductor parts of the line would  
21 increase?

22 A You're referring again to the overhead portion?

23 Q Correct. Overhead portion.

24 A The conductor portion?

25 Q Yes.

26 A Yes. If you ~~need~~ made an arbitrary assumption of  
that  
27 kind, yes, they would increase.

28 Q Would that increase be approximately, say,

1           A    The answer to that would be based on my Table 1,  
2   your Honor, from page 2-9 of my April testimony. And it's  
3   the bottom row of Table 2-9, where it shows the G-1/N-1  
4   defficiency.

5                   Whatever project were pursued to meet the  
6   requirement would have to be able to increase the  
7   nonsimultaneous import number by the amounts shown on the  
8   bottom row of Table 1.

9                   So in Year 2005, that first year of that project  
10   for that plan of expansion -- because it might be multiple  
11   projects, if you use the ORA's approach: a small project  
12   followed by a bigger project followed by a large project.  
13   The first year's expansion plan would have to allow for 81  
14   megawatts of increase in the NSIL.

15                   And then the second year would have to increase  
16   that to 234 level, so it would be an increase of about 150  
17   or -60 megawatts, I believe.

18                   And then that -- you can see that amount  
19   increases roughly by 120 to 150 megawatts a year. That  
20   would be the amount of incremental import capability that  
21   would be required in a grid-expansion plan.

22           Q    And that would be the amount of import capacity  
23   that would be required, assuming no change to the in-basin  
24   resource -- generating resources?

25           A    That's correct, assuming no increase or decrease  
26   in the available in-basin generation resources.

27           Q    Okay. If Valley-Rainbow is constructed, are the  
28   loss of SWPL and Encina 5 -- do they remain the key

1 Rainbow Substation were not constructed?

2 A There would be no additional substation required.  
3 I'm sorry. You said --

4 Q In order to perform the Talega-Escondido upgrade.

5 A If you wanted to perform the Talega-Escondido  
6 upgrade, you wanted to ~~adjust~~ add a second circuit to those  
7 existing towers --

8 Q Correct?

9 A -- and not loop in at Rainbow, you would not need  
10 any new substations. You would simply add substation  
11 equipment at Talega, and add substation equipment at  
12 Escondido, and string the new transmission conductors in a  
13 vacant position on the existing towers.

14 Q Okay. Thank you. If you could turn to the next  
15 page of Exhibit 1, where you're discussing the system  
16 voltage-support component of the project --

17 A What line is that, your Honor?

18 Q Line 8 and following, on page 2-6 of Exhibit 1.

19 A 2-6. Yes. I see it now.

20 Q We've already discussed the need or the value of  
21 this part of the project. If there was no 500 kV line  
22 constructed, would such voltage system support be necessary  
23 as a result of additional transmission expansion; for  
24 example, a Mission-Miguel expansion project?

25 A We haven't seen a need for reactive support for  
26 projects like that to date.

27 Q All right. If you could turn to page 2-7, in  
28 lines 10 through 14, you discuss the concern regarding

1 common mode failures?

2 A Yes.

3 Q It's been my observation that transmission lines  
4 are frequently located in close proximity to one another,  
5 just from driving in various places in this country and in  
6 other countries. Are there statistics that you relied on to  
7 support your fundamental argument that power lines in common  
8 corridors fail more frequently than those that are  
9 geographically isolated?

10 A Well, I'm reflecting recent operating experience,  
11 your Honor, with the San Onofre switchyard outage that  
12 caused an outage of the whole path in February of this year,  
13 as well as WSCC planning and operating practices that  
14 require WSCC member systems to look at the outage of  
facilities  
15 on a common corridor, and to plan accordingly.

16 Q And based on your experience, are you aware of  
17 whether these are based on any observations of that common  
18 corridor that transmission lines fail more frequently than  
19 those that are geographically isolated?

20 A Oh, by all means, yes. That type of historical  
21 data is clearly available.

22 Q Okay. And where would that type of information  
23 be available?

24 A That would be available in a variety of sources,  
25 probably in WSCC databases, also in the databases of the  
26 individual utilities. On a nationwide basis, it might even  
27 be available in some more common database, such as a  
28 Department of Energy database, but I don't know if that's

1 continues, then, on to page 2-23. And you indicate that  
2 the -- that on attachment -- that Attachment 4 shows the  
3 various proposals and the new generation from western  
4 Arizona and Baja California, Mexico. Is that correct?

5 A Yes, I see that.

6 Q From what I can see on Attachment 4, it appears  
7 that all of the generation that's described there is in  
8 Mexico or in California.

9 A Yes. I see your question. And I didn't realize  
10 until you pointed it out just now that we did not actually  
11 show the location of any new generation in Arizona on this  
12 diagram, and I apologize for that.

13 Q Could you go through the expected Arizona  
14 generation, and the capacity of those?

15 A Yes. I can give you information on that. And  
16 I'm trying to think if we may have provided that in a data  
17 response; we probably have, but let me simplify it if I may.

18 There is generation proposed in western Arizona  
19 at various locations. A large amount of that generation is  
20 in the immediate vicinity of the Palo Verde Substation,  
21 which is on the far right side of my Attachment 4.

22 As a result of that large amount of generation  
23 that's being built there, the transmission owner at  
24 Palo Verde, which is the Salt River project -- has already  
25 constructed a second switchyard, which is in series with the  
26 North Gila, G-i-l-a -- ~~North Gila~~ Palo Verde project. |

27 That second switchyard -- and I'll spell this for  
28 you also -- is called the Hasayampa Substation. And I

1 Imperial Valley --

2 Q Okay.

3 A -- and Otay.

4 Q On this map of -- that's -- or diagram of  
5 Attachment 4, are the facilities that connect at Otay Mesa  
6 or at the proposed Otay Mesa switchyard, are those all  
7 located in California?

8 A Yes, those are located in California, your Honor.

9 Q And the ones that are in -- interconnect with  
10 Imperial Valley or La Rosita are in Mexico?

11 A Well, I may have misunderstood your question. I  
12 thought you were asking: Is the proposed Otay Mesa  
13 switchyard site located in California?

14 Q No. The generators that are interconnecting with  
15 that location.

16 A The generators, yes. Now I understand your  
17 question. My apology.

18 The Otay Mesa project is located adjacent to the  
19 switchyard, the generating project that is proposed by  
20 Calpine, so that is in California.

21 ~~AAP~~ AEP Resources has not disclosed to us the  
22 physical location of their proposed generation site. They  
23 have only applied to SDG&E for interconnection into the  
24 Otay Mesa switchyard, or if Otay Mesa is never built,  
24 they've applied for interconnection directly into the ~~Gal~~  
Miguel  
26 switchyard. ]

27 That generation may be located in either U.S. or  
28 Mexico. They have not disclosed the location to us.

fall

1 I only see two projects or two alternatives  
2 in the laundry list of the ~~ISO's~~ ORA's suggestions that would  
3 in that category; and, as I recall those without looking at  
4 the full attachment, they were a 500 kV system from the  
5 Edison system in the Serrano area to SONGS and then  
6 additions to the San Diego system South of SONGS. And they  
7 also talked about a 500 kV that went all the way to Miguel.

8 So that was one category of upgrades that might  
9 have the potential to be a full replacement project for  
10 Valley-Rainbow.

11 The other one they talked about was a high-  
12 voltage DC conversion. It's a little unclear to me how they  
13 would intend to build something like that. Clearly, that  
14 would require comparable right-of-way to a new 500 kV  
15 alternating current line, plus it would require massive  
16 substation constructions on new sites to accommodate  
17 the AC/DC terminal equipment.

18 And I don't know physically how that could be  
19 located, but in any case that may have the potential to be a  
20 displacement project. Again, that would need considerable  
21 reinforcement south of San Onofre as well as between Serrano  
22 and the SONGS area, which I believe is how they described  
23 it.

24 Q But, in essence, you would need -- in your  
25 opinion, the need for Valley-Rainbow would need to be --  
26 or a project like it -- would need to be moved at least  
27 10 years out on the planning horizon if not more before  
28 you'd consider the need to be eliminated at this point



1           Q    Next, Mr. Korinek, Mr. Mihaly asked you yesterday  
2   a couple questions about South Bay and Encina, and in  
3   particular perhaps extending the existing RMR contracts.

4                   Do you recall that line of questioning?

5           A    I do.

6           Q    And there was a question about what would happen  
7   if the plants were no longer economic to continue to run.

8                   My question to you is if that were the case --  
9   if it became uneconomic for South Bay and Encina to run,  
10  would that change the RMR cost that SDG&E would be -- would  
11  have to pay? ]

12           A    Yes. I'm advised that ~~we~~ it ~~changes~~ the RMR  
costs  
13  significantly. I believe in my answer to the questions from  
14  Mr. Mihaly that I indicated that all of the units at  
15  South Bay except one were currently on RMR contracts. And I  
16  believe I stated that all five of the units at Encina are  
17  currently on RMR contracts.

18                   On further review, I was in error. Only four of  
19  the units at Encina are on RMR contracts today; Encina 4 is  
20  not. And so currently South Bay 4 is not on an RMR  
21  contract, and neither is Encina 4.

22                   In response to the cost of the RMR contracts,  
23  they are designed in a way that if the units are competitive  
24  in the market then, the only cost obligation that SDG&E's  
25  ratepayers have is for any additional operating costs that  
26  they may incur as a result of ISO operating orders.

27                   However, if the units are no longer able to  
28  compete in the market, and therefore need full cost

1 you change the input variables, are you saying would we get  
2 a different result?

3 Q If you modify -- all right, let's see.

4 What is the growth rate that is assumed from 2004  
5 to 2005 in your table on page 3-1?

6 A I calculate the growth rate to be 3.79 percent  
7 between 2004 and 2005 with a one-in-ten-year case.

8 Q Now, if you were to assume a different growth  
9 rate, I'm assuming that you would have a different outcome  
10 for the peak load that is identified here in 2005; is that  
11 correct?

12 A If the underlying expected case, the 50/50 case  
13 and all things that drive that case were different, then the  
14 one-in-ten-year case would change accordingly.

15 Q Okay. Can you give me a better understanding of  
16 what are the variables that influence the projected growth  
17 rate?

18 A There's quite a long list. The process itself  
19 starts by modeling the sales to various customer classes,  
20 residential classes, driven by variables such as -- besides  
21 weather, income, housing types, energy prices.

22 In the small commercial industrial sectors,  
23 they're driven also by prices, weather and employment  
24 primarily. And after we've completed the energy portion, we  
25 use that to essentially drive the peak load along with some  
26 additional variables. There's an additional price variable  
27 for the peak load. And I guess there's a few other  
28 variables I should mention, too, like appliance ~~plants~~ and  
building

1     you've identified, E2, E4, you assumed dry hydro conditions;  
2     is that correct?

3             A     Yes.

4             Q     Okay.

5                     And when you say on this table that you assumed  
6     dry hydro conditions, does that mean you assumed dry hydro  
7     conditions in 2005, 2006, 2007, 2008, 2009 and 2010, all of  
8     those years?

9             A     Yes.

10            Q     Okay.

11                   And when you assume dry hydro conditions, that  
12     means that you are assuming we will experience what's  
13     referred to as a one-in-35-year drought?

14            A     That's what we modeled here is the drought that  
15     we had in the year 2000-2001, which has been characterized  
16     as a one-in-35-year drought.

17            Q     Meaning, statistically speaking, you would expect  
18     it to occur one year out of 35?

19            A     Yeah, or alternatively it's the second worst  
20     in the seventy ~~seven~~ years of history is what that really |  
   means.

21            Q     Okay.

22                   So the benefit number shown here on your  
23     Table 1-1 of 504 million and some change, that's calculated  
24     assuming six years in a row of drought at a level of one --  
25     at a level expected once every 35 years?

26            A     Yes.

27            Q     And in your rebuttal testimony, Exhibit 5,  
28     Chapter 5, page 25, lines 15 to 16 you state, and I quote:

1 so I could plot it here.

2 I overlaid this on a similar plot that we had for  
3 our typical week, and it's very close; so we would not have  
4 any differences because of hourly loads.

5 But I just plotted that there -- I don't know if  
6 they ran four weeks -- different weeks or for typical weeks,  
7 but they should be the same in any -- they're still very  
8 similar in any event.

9 Q Are you --

10 ALJ COOKE: By "they," you mean who?

11 THE WITNESS: I don't know if ORA ran four different  
12 weeks or four identical weeks.

13 ALJ COOKE: Thank you.

14 MR. SCARFF: Q Are you aware that the SERASYM  
15 submodel called LOADSYM -- that's all caps L-O-A-D-S-Y-M --  
16 does not use typical weeks as the building blocks for which  
17 months are made?

18 A No, I'm not aware.

19 Q But the --

20 A I don't know if it does or it does not.

21 I just don't know.

22 Q Do you know which week in January this figure  
23 represents from the ORA data?

24 A I could check it, and it might be worthwhile just  
25 looking -- if there are four weeks -- and then to see just  
26 how much difference there is.

27 But I don't know.

28 Q Certainly. Could you do that?